

**TECHNICAL REVIEW AND EVALUATION OF
APPLICATION FOR AIR QUALITY CONTROL PERMIT
FOR EXISTING SOURCE**

PERMITTEE: El Paso Natural Gas Co. DATE: August 7, 1997

ADDRESS: P.O. Box 1492 PERMIT NO.: 1000168

El Paso, TX 79978 NEW SOURCE: N

EQUIPMENT LOCATION: Eight miles E. on Country Club Rd from Exit 343 off I-10 RENEWAL: Y

Willcox, Cochise County, AZ 85643 TITLE V SOURCE: Y

PERMIT CLASS: I PORTABLE: N

PERMIT ENGINEER: Sandy Farace

APPLICABLE REGULATION	CONDITION	MEETS CONDITION			SEE RMK NO.	RVWD BY
		YES	NO	N/A		
R18-2-326	A. <u>ADMINISTRATION</u>			X	1	SF1
	1. Have all applicable fees been paid?					
Appendix 1 R18-2-304.E	2. Has a complete application been submitted? (attach completeness checklist)	X				SF1
R18-2-304.G	3. Has additional information necessary to address any requirements which became effective after the application was filed been submitted? (if applicable)			X		SF1
R18-2-307.A	4. Has a copy of the complete application been submitted to the EPA for review (only required if the application is for a Class I permit)?	X				SF1
R18-2-305	6. Confidentiality			X		SF1
	a. If portions of the application were submitted with a notice of confidentiality, has the applicant been notified as to the Director's confidentiality determination?					
	b. If portions of the application have been determined by the Director to be confidential, has a notice of confidentiality been included in the file?			X		SF1
R18-2-101.60 and 61	7. Is the source classified as a major source as per R18-2-101.61 or a major modification as per R18-2-101.60?	X				SF1
R18-2-306.8.e	8. Has all information and records requested by the Director or the Hearing Board been submitted?	X				SF1
R18-2-310, 309, and 327	9. Have all emission inventory questionnaires, excess emission reports, and compliance certifications been submitted?	X				SF1
ARS § 49-402	10. Does the Arizona Department of Environmental Quality have jurisdiction over this source?	X			2	SF1

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		YES	NO	N/A		
Articles 7, 9 and 11	B. <u>AIR POLLUTION CONTROL EQUIPMENT</u>	X				
	1. Have the parameters of all process equipment which may cause or contribute to air pollution been identified?					SF1
	2. Have all air releases containing regulated air pollutants (including any hazardous air pollutants) been identified and characterized as to strength, concentration, and type of pollutant?	X				SF1
Articles 7, 9 and 11	3. Has the applicant demonstrated that each emission unit is so designed, controlled, or equipped with such air pollution control equipment that it may be <u>expected</u> to operate without emitting or causing to be emitted air contaminants in violation of A.A.C. Title 18, Chapter 2, Articles 7, 9, and 11? (Attach calculations.)			X	3	SF1
Article 6	4. Has the applicant demonstrated that each non-point emission unit is so designed, controlled or equipped with such air pollution control equipment that it may expect to comply with requirements of Article 6 emissions from existing and new non-point sources?	X			4	SF1
A.R.S. §49-427.C	5. Has the source been constructed according to the prior permit? (if not, the source must first obtain a permit revision before receiving a permit renewal)	X			5	SF1
Articles 7, 9 and 11	6. Has the source demonstrated that proposed positive control techniques can be maintained at full operational capacity? (Attach calculations.)	X			3	SF1
Articles 6, 7 & 9	C. <u>REGULATORY SUMMARY</u>					
	1. Has the applicant supplied sufficient material to demonstrate that emission standards can be met for the following:					
	a. Visible emissions	X				SF1
	b. Particulate emissions	X				SF1
	c. Sulfur dioxide emissions	X				SF1
	d. Total sulfur emissions			X		SF1
	e. Volatile organic compounds	X				SF1
	f. NO _x emissions	X				SF1
	g. Other pollutants _____	X				SF1

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		YES	NO	N/A		
Article 11	2. Has the applicant demonstrated the emissions from the facility are such that they will meet hazardous air pollutant standards?			X		SF1
R18-2-312	3. Have any performance tests required by the prior permit been conducted?	X			6	SF1
R18-2-312	4. Has a visible emission test been performed? (if applicable)			X		SF1
R18-2-306	5. Does the permit contain all requirements which became applicable to the source after the prior permit was issued?	X				SF1
R18-2-309.2	6. Does the permit contain a requirement for the submittal of compliance certifications (at least annually)?	X				SF1
R18-2-309.5	7. Does the permit contain a compliance plan which outlines the procedures used to comply with all requirements and specifies the means for demonstrating compliance?	X				SF1
R18-2-309	8. Does the permit contain a compliance schedule to be used to achieve compliance with those items with which the source does not currently comply.			X	7	SF1
R18-2-306.3,4	9. Does the permit contain sufficient monitoring, reporting and recordkeeping requirements to determine whether or not the source is in compliance at any time?	X				SF1

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APPLICATION FOR AIR QUALITY CONTROL PERMIT**

PERMITTEE: El Paso Natural Gas Company - Bowie Station

DATE: 05/02/94

**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT NO. 1000168**

REMARKS

REMARK NUMBER	REMARKS	REVIEWED BY
1.	This application is submitted for renewal of existing operating permit #031218PO-98 for El Paso's Bowie Compressor Station.	SF1
2.	The facility is located near Willcox, Cochise County. ADEQ has jurisdiction over this source.	SF1
3.	El Paso operates one turbine for natural gas transmission. No control equipments are used to control emissions from burning natural gas.	SF1
4.	El Paso will control emissions of non-point sources by maintaining gravel, adding fresh vegetation and using dust suppressants and wetting agents.	SF1
5.	The GE turbine was installed in 1971.	SF1
6.	Performance tests are required to be conducted annually for all major sources. Since the Bowie station did not operate at full capacity or was not fully operational since the time of installation, no testing has been conducted to-date.	SF1
7.	El Paso has to-date no records of any violations.	SF1
	ADDITIONAL REMARKS	
8.	The current operating permit (#031218PO-98) stipulates that Bowie may uprate the existing GE turbine from 9800 hp to 10736 hp. Bowie has not yet made this uprate, so only the existing source performance standards of A.A.C. Title 18, Chapter 2 apply. If the turbine is uprated during the course of the permit, EPNG may then be subject to 40 CFR 60 Subparts A and GG, if the uprate incurs any capital expenditure.	SF1
9.	Compliance status: According to Field Activity Report (FAR) #11511 dated September 21, 1994, El Paso's Bowie Compressor Station is in compliance. Note: The FAR states that the turbine has a rating of 10,400 hp. According to Jerry Comaduran of EPNG, the turbine has not been uprated and remains at 9800 hp.	SF1

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10.	There is no permit condition to require sulfur monitoring and reporting included in the Title V permit because EPNG combusts only pipeline quality natural gas. In addition, their sulfur content is limited by the FERC Tariff agreement. Therefore, EPNG should not exceed the standards outlined in A.A.C R18-2-719.	SF1
11.	<p>EPNG has proposed the following exemptions:</p> <p><i>(1) <u>Lubricating oils</u> - EPNG stores oils in lubricating tanks at the Bowie facility that are less than 10,000 gallons and have a vapor pressure less than the fuel oils exempted in R18-2-701.21. EPNG proposes that ADEQ exempt the oil storage tanks from R18-2-710, or list this requirement as inapplicable.</i></p> <p>ADEQ agrees that monitoring, reporting and recordkeeping requirements are not applicable to Bowie's oil tanks and has listed this activity as insignificant.</p> <p><i>(2) <u>Sulfur monitoring</u> - EPNG's GE Turbine burns only pipeline quality natural gas that contains less than 0.8% by weight sulfur, as required by its FERC Tariff. EPNG requests to exempt sulfur recording and reporting required in R18-2-719.I and J.</i></p> <p>ADEQ has determined that this is acceptable.</p>	SF1